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February 24, 2023

Kathryn Lundy  
Freeborn & Peters LLP  
1155 Avenue of the Americas  
26<sup>th</sup> Floor  
New York, New York 10036  
(via email: [klundy@freeborn.com](mailto:klundy@freeborn.com))

RE: Staley, et al. v. FSR International Hotel Inc., et al.  
22-CV-6781(JSR)

Dear Ms. Lundy:

I write this Supplemental Disclosure Letter on behalf of the Plaintiffs to supplement their Initial Disclosures and Discovery Responses as follows:

1. With respect to Document Request Number 2, excluding attorneys from the definition, and with the understanding that Defendants have narrowed this request to not seek any documents protected from disclosure by the attorney-client and/or attorney work product provisions, outside of the documents previously exchanged by the parties, Plaintiffs do not have any other relevant documents in their possession, custody or control.
2. With respect to Document Request Numbers 12 and 13, Plaintiffs do not possess any opt out of C.A.R.E. documentation.
3. In response to Defendants' request for certain documents to be reproduced with clearer copies, Plaintiffs refer Defendants to the documents annexed herein bearing Bates Stamp Numbers Staley v FSR 0263 – 0303.
4. Plaintiffs estimated breakdown of damages are as follows:
  - a. Plaintiff Selena Staley's estimated damages are as follows:
    - i. compensatory damages are \$75,000.00, which is based on (1) \$22,000.00 in No Fault Separation Pay; (2) \$17,667.00 in WARN Act Damages for each of the three violations of the WARN Act totaling \$53,000.00;



- ii. attorneys' fees and costs which are protected from disclosure by the attorney-client privilege and attorney work-product privilege, are continuing to accrue and have not yet been determined; and,
    - iii. interest.
  - b. Plaintiff Vivian Holmes's estimated damages are as follows:
    - i. compensatory damages are \$85,000.00, which is based on (1) \$32,000.00 in No Fault Separation Pay; (2) \$17,666.67 in WARN Act Damages for each of the three violations of the WARN Act totaling \$53,000.00;
    - ii. attorneys' fees and costs which are protected from disclosure by the attorney-client privilege and attorney work-product privilege, are continuing to accrue and have not yet been determined; and,
    - iii. interest.
  - c. Plaintiff Olive Ivey's estimated damages are as follows:
    - i. compensatory damages are \$110,000.00, which is based on (1) \$44,500.00 in No Fault Separation Pay; (2) \$21,8333.00 in WARN Act Damages for each of the three violations of the WARN Act totaling \$65,500.00;
    - ii. attorneys' fees and costs which are protected from disclosure by the attorney-client privilege and attorney work-product privilege, are continuing to accrue and have not yet been determined; and,
    - iii. (4) interest.
- 5. For information responsive to Document Request Number 33, Plaintiffs refer Defendants to the following articles:
  - a. <https://nypost.com/2022/10/02/nycs-four-seasons-hotel-in-standoff-with-beanie-babies-mogul/>
  - b. <https://www.dailymail.co.uk/news/article-11273169/New-York-Four-Seasons-hotel-reopened-post-COVID-stay-closed-FOUR-YEARS.html>
  - c. <https://airmail.news/issues/2022-10-29/billion-dollar-babies>

Very truly yours,

/s/

Evan Brustein

cc: (all counsel of record via Email)

**VERIFICATION**

I, Selena Staley certify and declare as follows:

1. I am a Plaintiff in this action and I have read the Supplemental Disclosures Letter, dated February 24, 2023, by my attorney Evan Brustein, Esq. ("the Responses") and know its contents.
2. Certain information contained in the Responses are not within my personal knowledge.
3. The information contained in the Responses is based on information either within my personal knowledge or assembled by my attorneys and agents, and to the best of my knowledge, the information set forth in the Responses are true and correct.
4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2023

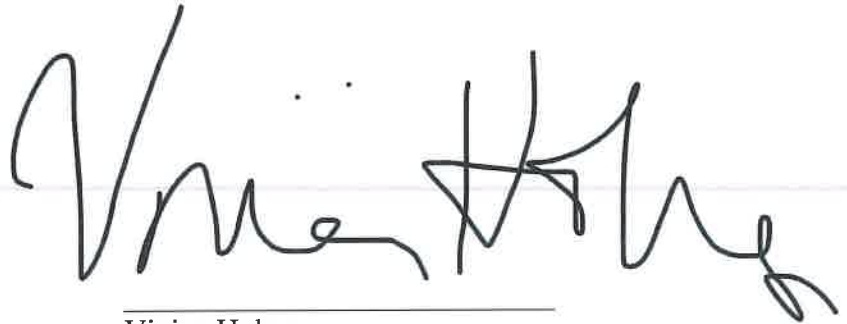
Selena Staley  
Selena Staley

**VERIFICATION**

I, Vivian Holmes, certify and declare as follows:

1. I am a Plaintiff in this action and I have read the Supplemental Disclosures Letter, dated February 24, 2023, by my attorney Evan Brustein, Esq. ("the Responses") and know its contents.
2. Certain information contained in the Responses are not within my personal knowledge.
3. The information contained in the Responses is based on information either within my personal knowledge or assembled by my attorneys and agents, and to the best of my knowledge, the information set forth in the Responses are true and correct.
4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2023

A handwritten signature in black ink, appearing to read 'Vivian Holmes', written over a horizontal line.

Vivian Holmes

**VERIFICATION**

I, Olive Ivey, certify and declare as follows:

1. I am a Plaintiff in this action and I have read the Supplemental Disclosures Letter, dated February 24, 2023, by my attorney Evan Brustein, Esq. ("the Responses") and know its contents.
2. Certain information contained in the Responses are not within my personal knowledge.
3. The information contained in the Responses is based on information either within my personal knowledge or assembled by my attorneys and agents, and to the best of my knowledge, the information set forth in the Responses are true and correct.
4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2023

  
Olive Ivey